



**KRONENBERGER ROSENFELD, LLP**

Karl S. Kronenberger (CA Bar No. 226112)

Jeffrey M. Rosenfeld (CA Bar No. 222187)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

jeff@KRInternetLaw.com

Attorneys for Defendant Tax Group Center, Inc.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**DAVID VAN ELZEN** and **RONALD  
RODRIGUEZ**, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

**TAX GROUP CENTER, INC.**, a California  
corporation,

Defendant.

Case No. 4:17-cv-01105-HSG

**STIPULATION AND ORDER SETTING  
PRETRIAL SCHEDULE**

Pursuant to the Court's direction at the June 6, 2017 initial case management conference, the parties to the above-entitled action stipulate to the pretrial schedule set forth below and respectfully request that the Court enter an order adopting this schedule.

|   |  |
|---|--|
| Completion of Mediation                                       | 08/02/17   |
| Deadline to Amend Pleadings                                   | 09/05/17   |
| Non-Expert Discovery Cutoff                                   | 12/12/17   |
| Designation of Experts  | 12/12/17   |
| Designation of Rebuttal Experts                               | 01/12/18   |
| Expert Discovery Cutoff                                       | 02/12/18   |
| Deadline to File Motion for Class Certification               | 08/03/18   |
| Deadline to File Opposition to Motion for Class Certification | 08/31/18 (or 28 days after filing of motion, whichever is earlier) |
| Deadline to File Reply to Motion for Class Certification      | 09/14/18 (or 14 days after filing of motion, whichever is earlier) |
| Last Day to Hear Motion for Class Certification               | 10/04/18 at 2:00 p.m.  |

DATED: June 12, 2017

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**KRONENBERGER ROSENFELD, LLP**

**LAW OFFICES OF S. COLEMAN, P.A.**

By: s/Jeffrey M. Rosenfeld  
Jeffrey M. Rosenfeld

By: s/Blake J. Dugger  
Blake J. Dugger\*

Attorneys for Defendant

One of the Attorneys for Plaintiffs  
\*Admission Pro Hac Vice

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: June 13, 2017

By: Haywood S. Gilliam, Jr.  
The Honorable Haywood S. Gilliam, Jr.  
United States District Court Judge